Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-21 are pending in the application, with claims 1, 6, and 15 being the independent claims. Based on the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Allowable Subject Matter

In the Office Action, the Examiner objects to claims 10-13 and 17-20 as being dependent upon a rejected base claim, but has indicated that these claims would be allowable if rewritten in independent form to include all of the limitations of the base and any intervening claims. Applicant acknowledges with appreciation the Examiner's conditional allowance of these claims. However, Applicant believes the Examiner's objections are moot in light of the remarks herein. As such, Applicant respectfully requests reconsideration and withdrawal of the above objections, and allowance of the aforementioned claims. Nonetheless, Applicant reserves the right to amend the above claims to place them in independent form in a future amendment.

Rejections under 35 U.S.C. § 102

The Examiner has rejected claims 1-5 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,564,250 to Nguyen ("Nguyen"). Applicant respectfully traverses.

Independent claim 1 recites "a system for providing a client with access to remote graphics rendering resources at a server." The recited server of claim 1 includes:

> a graphics application, at the server, wherein said graphics application receives commands from the client; and

> a remote rendering control system, at the server, that receives graphics instructions from said graphics application, generates modified graphics instructions on the basis of said graphics instructions, and outputs said modified graphics instructions to the remote graphics rendering resources.

Nguyen does not disclose the Applicant's invention as recited in independent claim 1. For example, Nguyen does not disclose "a server comprising ... a remote rendering control system, at the server, that receives graphics instructions from [a] graphics application [at the server], generates modified graphics instructions on the basis of said graphics instructions, and outputs said modified graphics instructions to the remote graphics rendering resources." At the very least, Nguyen does not disclose "remote graphics rendering resources" or a "remote rendering control system", as recited in claim 1.

On the contrary, Nguyen describes a server running a web browser, wherein the web browser contains functionality for transmitting a modified version of a web page to an internet appliance running a lightweight web browser ("miniclient"). *See* Nguyen, col. 2, ll. 33-35. The transmitted web page is modified in a manner that accounts for the quality of the transmission link as well as the display capabilities of the internet appliance running the miniclient. *See* Nguyen, col. 4, ll. 8-27. Nguyen provides no discussion of control or resources for the purpose of rendering graphics, much less remote rendering control or resources, as recited in claim 1.

Nguyen teaches that the server-side web browser application can make adjustments to graphic and text elements on a web page for optimal transmission to the miniclient. *See* Nguyen, col. 3, ll. 59-67. Applicant does not concede that Nguyen's system renders graphics; however, if Nguyen's system is assumed to render graphics, Nguyen's graphics are most likely rendered, if at all, by a client-side application (e.g., the "miniclient"). This reasoning is supported by the limited scope of operations the server-side web browser performs on graphic elements. Nguyen discloses that the graphic elements may be altered with respect to "the relative coarseness or fineness of the graphic element", "the relative size of the graphic element", "the relative color density of the graphic element", "the relative lossiness of compression of the graphic element", as well as "other measures of quality of the graphic element." *See* Nguyen, col. 3, ll. 49-58.

In Nguyen, the "graphic element" is at most for the sake of argument merely a set of "graphics instructions" which can be used to render an image. Claim 1 requires that a set of "modified graphics instructions" be generated, and the Examiner refers to Nguyen at col. 3, ll. 15-28 and col. 5, ll. 28-50 in order to support a finding that Nguyen discloses a similar feature. Nguyen, however, discloses transmission of "display updates 132 to the miniclient 111" not to a server side. *See* Nguyen, col. 3, ll. 15-28. The remote graphics rendering resources of claim 1 are responsible for performing the rendering function on the server side, whereas any rendering performed in the miniclient of Nguyen is necessarily performed on the client side. Accordingly, Nguyen cannot teach "remote graphics rendering resources at a server."

Further, Nguyen does not teach or suggest a separate "remote rendering control system" and "remote graphics rendering resources." Nguyen makes no reference of

"remote graphics rendering resources" except, as indicated by the Examiner, in using the

miniclient as the resource, in which case the resource is not located at a server.

Accordingly, the Examiner's rejection of claim 1 under 35 U.S.C. § 102(e) is traversed,

and Applicant respectfully requests that the rejection be withdawn.

Applicant submits that dependent claim 2 is not anticipated by Nguyen for at

least the same reasons as independent claim 1 from which it depends, and further in view

of its own respective features. Claim 2 recites the system of claim 1, "wherein said

remote rendering control system comprises a transparent interface to said graphics

application, and wherein said transparent interface supports initialization of a graphics

rendering session and accommodates client parameters during said graphics rendering

session." The web browser in Nguyen does not inherently support a "transparent

interface," as the Examiner states, because the web browser in Nguyen is a web browser

written for the specific purpose of communicating with the miniclient in a manner

uncommon to other web browsers. In contrast, the "graphics application, at the server" is

not necessarily "aware of ... redirection" of its instructions to a server-side processor.

See Specification, p. 6, ll. 21-30. Accordingly, the Examiner's rejection of claim 2 under

35 U.S.C. § 102(e) is also traversed, and Applicant respectfully requests that the

rejection be withdawn.

Applicant submits that dependent claims 3-5 are not anticipated by Nguyen for at

least the same reasons as independent claim 1 from which they depend, and further in

view of their own respective features. Accordingly, the Examiner's rejection of claims 3-

5 under 35 U.S.C. § 102(e) is also traversed, and Applicant respectfully requests that the

rejection be withdrawn.

Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 6-9, 14-16, and 21 under 35 U.S.C. § 103(a) as

being obvious over Nguyen in view of U.S. Patent No. 6,463,457 to Armentrout et al.

("Armentrout") and further in view of U.S. Patent No. 6,377,266 to Baldwin

("Baldwin"). Applicant respectfully traverses.

Independent claim 6 recites "a method of remote graphics rendering on behalf of

a client." The recited method of claim 6 includes the steps of:

> (A) initializing a graphics rendering session;
> (B) starting a graphics application on the basis of a
> command from the client;
> (C) generating graphics instructions;
> (D) imposing client parameters to produce modified
> graphics instructions;
> (E) sending the modified graphics instructions to graphics
> rendering resources;
> (F) rendering graphics on the basis of the modified
> graphics instructions to produce image data in one or more frame buffers;
> (G) reading image data from the one or more frame
> buffers;
> (H) enqueuing the image data; and
> (I) transmitting the image data to the client.

The Examiner relies on the reasoning used in rejecting independent claim 1 in

rejecting independent claim 6 on the basis of an application of Nguyen to steps (A)-(E)

and (I). The Examiner further relies on Armentrout as teaching "enqueuing the image

data" and on Baldwin as teaching the use of "frame buffers." *See* Office Action, p. 5.

For similar reasons as those stated above with regards to independent claim 1, Nguyen

does not teach or suggest the indicated features of independent claim 6. Furthermore,

even if such a combination is assumed to be proper for the sake of argument, Armentrout

and Baldwin fail to supply the missing teachings.

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                                              Appl. No. 09/629,458

It is further noted that Armentrout has a filing date of August 28, 2000, which is after the filing date of the present application, but claims priority to two provisional applications. These are Provisional Application No. 60/150,766 ("PA '766") and Provisional Application No. 60/210,344 ("PA '344"). PA '344 is shown to have a filing date of June 13, 2000, whereas PA '766 is shown to have a filing date of August 26, 1999. PA '766 nowhere teaches or suggests "enqueuing the image data", and the teachings of Armentrout col. 21, ll. 46-60 as cited by the Examiner are nowhere found in PA '766. Furthermore, PA '344 appears to be an unrelated provisional application filed by an unrelated party, to which Armentrout cannot claim priority, nor does PA '344 disclose "enqueuing the image data." Armentrout therefore nowhere teaches or suggests, in relevant part, "enqueuing the image data." Accordingly, the Examiner's rejection of claim 6 under 35 U.S.C. § 103(a) is traversed, and Applicant respectfully requests that the rejection be withdrawn.

Applicant submits that dependent claims 7-9 and 14 are not rendered obvious over Nguyen, Armentrout, and Baldwin for at least the same reasons as independent claim 6 from which they depend, and further in view of their own respective features. Accordingly, the Examiner's rejection of claims 7-9 and 14 under 35 U.S.C. § 103(a) is also traversed, and Applicant respectfully requests that the rejection be withdrawn.

Independent claim 15 recites "a computer program product comprising a computer usable medium having computer readable program code that enables remote graphics rendering on behalf of a client." The recited computer readable program code of claim 15 includes:

> first computer readable program code logic for causing a server to initialize a graphics rendering session;

second computer readable program code logic for causing the server to start a graphics application on the basis of a command from the client;

third computer readable program code logic for causing the server to generate graphics instructions;

fourth computer readable program code logic for causing the server to impose client parameters to produce modified graphics instructions;

fifth computer readable program code logic for causing the server to send the modified graphics instructions to graphics rendering resources;

sixth computer readable program code logic for causing the graphics rendering resources to render graphics on the basis of the modified graphics instructions to produce image data in one or more frame buffers;

seventh computer readable program code logic for causing the server to read image data from the one or more frame buffers;

eighth computer readable program code logic for causing the server to enqueue the image data; and

ninth computer readable program code logic for causing the server to transmit the image data to the client.

The Examiner has rejected independent claim 15 in a similar manner to claim 6.

Claim 15 is therefore not rendered obvious over Nguyen, Armentrout, and Baldwin for

similar reasons as independent claim 6, and further in view of its own respective

features. Accordingly, the Examiner's rejection of claim 15 under 35 U.S.C. § 103(a) is

traversed, and Applicant respectfully requests that the rejection be withdrawn.

Applicant submits that dependent claims 16 and 21 are not rendered obvious over

Nguyen, Armentrout, and Baldwin for at least the same reasons as independent claim 15

from which they depend, and further in view of their own respective features.

Accordingly, the Examiner's rejection of claims 16 and 21 under 35 U.S.C. § 103(a) is

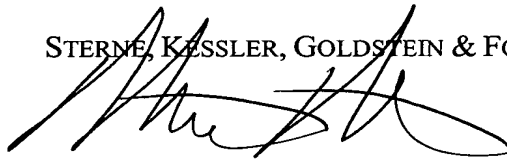also traversed, and Applicant respectfully requests that the rejection be withdrawn.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed,

accommodated, or rendered moot. Applicant therefore respectfully requests that the

Examiner reconsider all presently outstanding objections and rejections and that they be

withdrawn. Applicant believes that a full and complete reply has been made to the

outstanding Office Action and, as such, the present application is in condition for

allowance. If the Examiner believes, for any reason, that personal communication will

expedite prosecution of this application, the Examiner is invited to telephone the

undersigned at the number provided.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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